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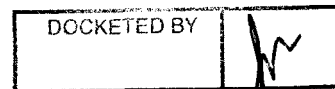
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August 30, 1999

VIA HAND DELIVERYArizona Corporation Commission
DOCKETED

AUG 30 1999

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007



Re: Arizona 271 Proceeding, Docket No. T-00000B-97-238

To the Commission:

Enclosed please find an original and 10 copies of AT&T Communications of the Mountain States, Inc. and TCG Phoenix, collectively ("AT&T") Motion to Change the Dates of the Workshops Established by Staff in the above-referenced matter.

Please feel free to contact Richard S. Wolters, at (303) 298-6741 if you have any questions or comments.

Very truly yours,

AT&T COMMUNICATIONS, INC. OF
THE MOUNTAIN STATES
Patricia L. vanMidde

Attachment

cc: Richard S. Wolters
Certificate of Service

CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner

MOTION TO CHANGE THE DATES OF THE WORKSHOPS ESTABLISHED BY STAFF

On August 25, 1999, Staff mailed a memorandum to all parties along with the agenda for the first workshop and a copy of the Master Test Plan developed by its consultant, Doherty and Company, Inc. ("DCI"). The memorandum set September 9, 1999, as the date for the first workshop. Although Staff was advised by a number of

parties, including AT&T, that the date conflicted with prior obligations of their experts, Staff ignored the parties' concerns. AT&T advised Staff that its OSS expert and lead OSS attorney would be in Nebraska participating in U S WEST's Nebraska § 271 proceedings scheduled for September 9 and 10, 1999. It is AT&T's understanding that ELI's OSS expert also will be participating in the Nebraska § 271 proceeding. It is also AT&T's understanding that MCI notified Staff that its OSS expert was unavailable until September 13, 1999.

In its Order, the Commission stated that "Staff recommended the workshops be conducted so that all parties have a full opportunity to participate and give their positions on U S WEST's OSS." Decision No. 61837 at 3. AT&T will make every effort to provide written comments by September 3, 1999, the date established by Staff. However, written comments alone will not allow AT&T to fully participate and give its position.

The portion of the first workshop allotted to the CLECs' statements of position represents only one item on the agenda for the first workshop. In addition, there are blocks of time reserved for a status report on OSS testing in other states, OSS measurements, an overview of the Staff consultant's Master Test Plan, and a discussion of the Master Test Plan. The block of time allotted to discuss the Master Test Plan is one hour and forty-five minutes. AT&T is essentially foreclosed from participating in the discussion. By scheduling the workshop at a time AT&T's experts cannot attend, AT&T is denied the "full opportunity to participate and give [its] positions on U S WEST's OSS."

Staff has also requested extensive written comments on the Master Test Plan and performance measurements on or before September 13, 1999. The first workshop is

scheduled for Thursday, September 9, 1999, and contemplates discussions regarding the Master Test Plan. The parties are supposed to file extensive written comments four days later, and according to Staff, should address issues raised during the discussion of the Master Test Plan at the first workshop held September 9, 1999. As noted earlier, AT&T's OSS experts will be in Nebraska on September 9 and 10, 1999. They also are scheduled to be in New Jersey on September 7 and 8. Therefore, AT&T will not have an opportunity to provide meaningful comments on the Master Test Plan.

It is AT&T's understanding that the notice of the first workshop was delayed in order to permit DCI to finalize the Master Test Plan and release it before the first workshop. It is also AT&T's understanding that Staff is concerned it may not be able to file its Report by October 15, 1999, unless it presses forward with its proposed workshop schedule, regardless of the parties' ability to participate.

Staff's original recommendation regarding the workshop process never contemplated that Staff or its consultant would release a Master Test Plan. The initial scope of DCI's work was to do a functional test. It did not include a capacity test. The Commission expanded the scope of DCI's work to include preparation of a Master Test Plan. *See* Master Test Plan, Executive Overview, at 5. Therefore, the 90-day period and the Report filing date of October 15, 1999, were established without any consideration of the preparation of the Master Test Plan by DCI. AT&T recommends that the October 15 date be extended 30 days. This is approximately the time it took DCI to establish the Master Test Plan.

AT&T respectfully requests that the Staff be ordered to confer with the parties and establish dates for written comments and the three workshops that provide all parties

the full opportunity to participate in the workshop process, and requests that the
October 15, 1999 date for Staff to file its Report be extended for 30 days.

RESPECTFULLY SUBMITTED this 30~~th~~ day of August, 1999.

AT&T COMMUNICATIONS OF
THE MOUNTAIN STATES, INC.
AND TCG PHOENIX

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CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the Motion to Change the Dates of the Workshops Established by Staff on behalf of AT&T Communications of the Mountain States, Inc. and TCG Phoenix, Inc., collectively ("AT&T") regarding Docket No. T-00000B-97-0238, were hand delivered this 30th day of August, 1999, to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was hand delivered, this 30th day of August, 1999 to the following:

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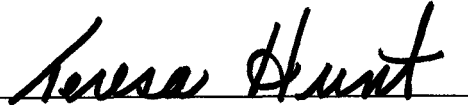
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Jerry Rudibaugh
Hearing Officer
Arizona Corporation Commission
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and I hereby certify that on the 30th day of August, 1999, I sent a copy of the foregoing Motion to Change the Dates of the Workshops Established by Staff on behalf of AT&T Communications of the Mountain States, Inc. and TCG Phoenix, Inc., collectively ("AT&T") regarding Docket No. T-00000B-97-0238, via facsimile and United States Mail, postage prepaid, to the following:

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and that a copy of the foregoing was sent via United States Mail, postage prepaid, this 30th day of August, 1999 to the following:

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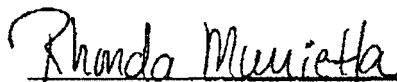
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